

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:23CR143
	:	
Plaintiff,	:	
	:	JUDGE BENITA Y. PEARSON
-vs-	:	
	:	
CHRISTIAN G. HERNANDEZ-MUNOZ,	:	<u>DEFENDANT’S UNOPPOSED</u>
	:	<u>MOTION FOR PERMISSION</u>
Defendant.	:	<u>TO TRAVEL</u>

Christian Hernandez-Munoz, through counsel, respectfully moves this Honorable Court for permission to travel to Holyoke, Massachusetts. He requests he be allowed to depart on July 1, 2023 and return on or before July 5, 2023. If permitted to travel, Mr. Hernandez-Munoz intends to travel via car from his home in Ashtabula, Ohio to a family member’s residence in Holyoke, Massachusetts. Traveling in the vehicle with Mr. Hernandez-Munoz would be his wife and adult (22-year-old) stepdaughter. The purpose of the travel is to visit with family, who reside in the Holyoke, Massachusetts area.

Undersigned counsel has conferred with U.S. Pretrial Services Officer Christopher Woo concerning this request. Officer Woo advised that Mr. Hernandez-Munoz has been in full compliance with his bond conditions. He also expressed that he does not oppose the travel request, so long as Mr. Hernandez-Munoz provides the address of the residence he will be staying. Undersigned counsel has complied with that request. Further, Mr. Hernandez-Munoz will provide any additional requested travel information to Officer Woo.

Undersigned counsel has also conferred with Assistant U.S. Attorney Jennifer King. She advised that the government has no objection to this motion.

For these reasons, Mr. Hernandez-Munoz requests that the Court grant this unopposed motion and grant him permission to travel, as detailed herein.

Respectfully submitted,

STEPHEN C. NEWMAN
Federal Public Defender
Ohio Bar: 0051928

/s/David E. Johnson
DAVID E. JOHNSON
Assistant Federal Public Defender
Ohio Bar: 0081505
1660 West Second Street, Suite 750
Cleveland, Ohio 44113
(216) 522-4856 Fax: (216) 522-4321
e-mail address: David_Johnson@fd.org.